

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

PLAINTIFFS' MOTION FOR PROTECTIVE ORDER

Pursuant to Fed. R. Civ. P. 37 and E.D. Va. Local Rule 37, Plaintiffs submit this Motion for Protective Order. For the reasons set forth in the accompanying Memorandum in Support, Plaintiffs respectfully request the Court to grant this Motion and issue a protective order prohibiting the depositions of Dennis Kooker, Jeff Walker, Audrey Ashby, and Andy Swan by Defendants Cox Communications, Inc. and CoxCom, LLC.

LOCAL RULE 37(E) MEET AND CONFER STATEMENT

Counsel for Plaintiffs sent multiple emails to Cox regarding its untimely deposition notices to Dennis Kooker, Jeff Walker, Audrey Ashby, and Andy Swan (the "Fact Witnesses"), including on June 26, 2019. The parties' respective counsel have held telephonic meet-and-confers, including on June 27, 2019, regarding, among other issues, the depositions of the four Fact Witnesses. Despite their efforts, the parties were unable to resolve all of their disputes, including those raised by the instant motion, though Plaintiffs will continue to confer in good faith to determine whether any of the issues raised herein may be mooted.

Dated: June 30, 2019

Respectfully submitted,

/s/ Scott A. Zebrak

Scott A. Zebrak (38729)
Matthew J. Oppenheim (*pro hac vice*)
Jeffrey M. Gould (*pro hac vice*)
OPPENHEIM + ZEBRAK, LLP
4530 Wisconsin Avenue, NW, 5th Floor
Washington, DC 20015
Tel: 202-480-2999
scott@oandzlaw.com
matt@oandzlaw.com
jeff@oandzlaw.com
Attorneys for Plaintiffs